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August 10, 2021

Via ECF

The Honorable J. Paul Oetken, U.S.D.J.
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007
Courtroom: 706

*Re: FG Hemisphere Assocs., LLC v. Dem. Repub. of Congo, et ano., No. 19-mc-00232
(JPO) – Letter Motion to Seal*

Dear Judge Oetken:

We represent Plaintiff FG Hemisphere Associates, LLC (“Plaintiff”) in the above-referenced matter. We write pursuant to Rule 2(E) Your Honor’s Individual Rules and Practices to request permission to file an *ex parte* application under seal until Plaintiff’s application may be heard by the Court. As set forth in Plaintiff’s application, good and sufficient cause exists for immediate *ex parte* relief and due to the sensitive nature of the application, prior notice is impractical under the circumstances. Plaintiff respectfully request a hearing on its *ex parte* application at the Court’s earliest convenience. No previous request for the relief sought in the *ex parte* application has been made to this Court or any other court.

We are available at Your Honor’s convenience to discuss this matter in more detail. Thank you for your consideration of this request.

Respectfully submitted,

Warren E. Gluck

Warren E. Gluck
Counsel for Plaintiff

cc: OetkenNYSDChambers@nysd.uscourts.gov
All Counsel of Record (via ECF)